

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)  
Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**STIPULATION AND ORDER CONCERNING THE CONFIDENTIALITY OF  
DOCUMENTS PRODUCED BY THIRD PARTIES**

THE PARTIES HERETO STIPULATE AND AGREE, subject to the approval of the Court, that defendant Chi Mei Optoelectronics Corporation hereby joins and submits to the June 24, 2008 Stipulation and Order Concerning the Confidentiality of Documents Produced By Third Parties [D.I. 294], a copy of which is attached hereto as Exhibit A.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Jonathan Kagan  
Alexandar C.D. Giza  
Adam Hoffman  
Irell & Manella LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
(310) 203-7092

/s/ Philip A. Rovner  
Philip A. Rovner (#3215)  
Hercules Plaza  
P.O. Box 951  
Wilmington, DE 19899  
(302) 984-6000  
provner@potteranderson.com

*Attorneys for Chi Mei Optoelectronics Corporation  
and Chi Mei Optoelectronics USA, Inc.*

BAYARD, P.A.

OF COUNSEL:

Gaspare J. Bono  
R. Tyler Goodwyn, IV  
Lora A. Brzezynski  
Cass W. Christenson  
McKenna Long & Aldridge LLP  
1900 K Street, N.W.  
Washington, D.C. 20006  
(202) 496-7500

/s/ Richard D. Kirk  
Richard D. Kirk (#0922)  
Ashley B. Stitzer  
222 Delaware Avenue, 9th Floor  
P.O. Box 25130  
Wilmington, DE 19899-5130  
(302) 655-5000  
rkirk@bayardfirm.com

*Attorneys for LG Display Co., Ltd. and LG Display America, Inc.*

YOUNG CONAWAY STARGATT & TAYLOR, LLP

OF COUNSEL:

Vincent K. Yip  
Peter J. Wied  
Terry Garnett  
Katherine Murray  
Paul Hastings, Janofsky & Walker LLP  
515 South Flower Street, 25th Floor  
Los Angeles, CA 90071  
(213) 683-6000

/s/ Karen L. Pascale  
Karen L. Pascale (#2903)  
John W. Shaw  
The Brandywine Building  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899-0391  
(301) 571-6600  
kpascale@ycst.com

M. Craig Tyler  
Brian D. Range  
Wilson Sonsini Goodrich & Rosati  
8911 Capital of Texas Highway North  
Westech 360, Suite 3350  
Austin, TX 78759-8497  
(512) 338-5400

*Attorneys for AU Optronics Corporation and AU Optronics Corporation America*

Ron E. Shulman  
Julie Holloway  
Wilson Sonsini Goodrich & Rosati  
650 Page Mill Road  
Palo Alto, CA 94304-1050

SO ORDERED this \_\_\_\_ day of July, 2008.

---

United States District Judge

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG DISPLAY CO., LTD.,	Plaintiff,	Civil Action No. 06-726 (JJF) Civil Action No. 07-357 (JJF)
	v.	<b>CONSOLIDATED CASES</b>
CHI MEI OPTOELECTRONICS CORPORATION, et al.	Defendants.	

**STIPULATION AND ORDER CONCERNING THE CONFIDENTIALITY OF  
DOCUMENTS PRODUCED BY THIRD PARTIES**

WHEREAS LG Display Co., Ltd. and LG Display America, Inc. (collectively "LG Display") and AU Optronics Corporation and AU Optronics Corporation America (collectively "AUO") intend to protect their rights and interests with respect to confidential information and documents that may be produced by third parties in response to any subpoena or letter of request issued by or on behalf of AUO and LG Display.

WHEREAS third parties may produce confidential information concerning AUO and LG Display, including product, financial, and business information, without designating that information as confidential; and

WHEREAS Delaware Local Rule 26.2 provides for protection of confidential information pending entry of a protective order;

THE PARTIES HERETO STIPULATE AND AGREE, subject to the approval of the Court, that:

1. All documents produced by third parties in this case concerning AUO and LG Display, including in response to any subpoena or letter of request, shall be deemed and treated as confidential and disclosed to "outside counsel only," as provided in Del. L.R. 26.2, for a

Dbt f 12;17.dw11837.KKG!!!!Epdvn f ou3: 5!!!!!!Gjne!170350119!!!!Qbfh!3!pg4

period of thirty (30) days after the date that the documents are received by counsel for AUO and LG Display.

2. During the thirty (30) day period referenced in paragraph one, AUO and LG Display may designate any document that includes confidential information as protected under Del. L.R. 26.2 and/or any protective order entered in this case.

3. AUO and LG Display will treat all documents designated as confidential by any producing third party as protected by Del. L.R. 26.2 and/or any protective order, without the need for any further designation by AUO and LG Display.

4. Any documents designated as confidential by any third party, by AUO, or by LG Display, shall be protected and not disclosed to any person except as authorized by Del. L.R. 26.2 or any protective order for the duration of this case and thereafter, and shall be subject to all terms of any protective order that applies to the confidentiality of discovery in this case, including any provisions concerning patent prosecution.

5. This stipulation and order applies to documents produced by third parties before or after the execution and entry of this stipulation and order.

6. This stipulation is solely for purposes of protecting confidential information produced by third parties and AUO and LG Display reserve any other rights or objections concerning any subpoena or letter of request issued in this case, and further reserve all objections concerning admissibility or relevance of any information produced by third parties.

DRAFT 12/17.dv11837.KKG!!!!Epdvn foul3: 5!!!!!!Gjhe!1703508119!!!!Qohf!4!pd4

June 20, 2008

## OF COUNSEL:

Gaspare J. Bono  
 R. Tyler Goodwyn, IV  
 Lora A. Brzezynski  
 Cass W. Christenson  
 McKenna Long & Aldridge LLP  
 1900 K Street, N.W.  
 Washington, D.C. 20006  
 (202) 496-7500

## BAYARD, P.A.

/s/ Richard D. Kirk (rk0922)  
 Richard D. Kirk  
 Ashley B. Stitzer  
 222 Delaware Avenue, 9th Floor  
 P.O. Box 25130  
 Wilmington, DE 19899-5130  
 (302) 655-5000  
 rkirk@bayardfirm.com

*Attorneys for LG Display Co., Ltd. and LG Display America, Inc.*

## OF COUNSEL:

Vincent K. Yip  
 Peter J. Wied  
 Terry Garnett  
 Katherine Murray  
 Paul Hastings, Janofsky & Walker LLP  
 515 South Flower Street, 25th Floor  
 Los Angeles, CA 90071  
 (213) 683-6000

M. Craig Tyler  
 Brian D. Range  
 Wilson Sonsini Goodrich & Rosati  
 8911 Capital of Texas Highway North  
 Westech 360, Suite 3350  
 Austin, TX 78759-8497  
 (512) 338-5400

Ron B. Shulman  
 Julie M. Holloway  
 Wilson Sonsini Goodrich & Rosati  
 650 Page Mill Road  
 Palo Alto, CA 94304-1050

## YOUNG CONAWAY STARGATT &amp; TAYLOR, LLP

/s/ Karen L. Pascale (kp2903)  
 Karen L. Pascale  
 John W. Shaw  
 The Brandywine Building  
 1000 West Street, 17th Floor  
 P.O. Box 391  
 Wilmington, DE 19899-0391  
 (301) 571-6600  
 kpascalle@ycst.com

*Attorneys for AU Optronics Corporation and AU Optronics Corporation America*

SO ORDERED this 24 day of June, 2008.

  
 United States District Judge